VP JRB: USAO 2016R00567

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
	*	
v.	*	**CRIMINAL NO.** 16-2091TJS
	*	
KEVIN HEITING	*	**UNDER SEAL**
	*	
	*******	

_____ FILED _____ ENTERED
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AUG 18 2016

AT GREENBELT
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY DEPUTY

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Christine D. Carlson, being duly sworn, depose and state:

INTRODUCTION

1. I am a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) assigned to the Special Agent in Charge in Baltimore, Maryland. I have been so employed since June 1996. As part of my daily duties as an HSI Special Agent, I investigate criminal violations relating to child exploitation and child pornography including violations pertaining to the illegal production, distribution, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252 and 2252A. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. I have also participated in the execution of search warrants, which involved child exploitation and/or child pornography offenses. I have received formal training from U.S. Customs, ICE, HSI and other agencies in the area of child pornography, pedophile behavior, collectors of other obscene material and Internet crime. As a federal agent, your Affiant is authorized to investigate

violations of laws of the United States and is a law enforcement officer with the authority to execute warrants issued under the authority of the United States.

2. I am submitting this affidavit in support of a criminal complaint and arrest warrant for KEVIN HEITING ("HEITING"), born in 1988, for violation of Title 18, United States Code, Section 2252A(a)(5)(B) (Possession of Child Pornography). The statements in this affidavit are based in part on information, documents, and reports prepared by the Swiss Cybercrime Coordination Unit (CYCO), the Swiss Federal Police, HSI Atlanta Special Agents, and on my experience and background as a Special Agent of HSI. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation.

INVESTIGATION OF KEVIN HEITING

3. In February 2016, the Swiss Cybercrime Coordination Unit (CYCO) in Bern, Switzerland passed along information to the Swiss Federal Police regarding an individual that was using the Swiss Virtual Private Network ("VPN") service of Monzoon Networks to download child pornography through the Kad and eDonkey peer-to-peer networks.[1] The IP address from which the VPN connection originated was U.S. based. The CYCO received information from Monzoon Networks that VPN IP address 46.253.179.131 was purchased over www.swissvpn.net on February 3, 2016 at 19:26:16 MEZ (UTC+1) using IP address 69.136.237.81, email address: foxhound11111111@netscape.net and the name: Kevin HEITING. The Monzoon Networks records regarding this purchase also revealed the payment method used to purchase the VPN service was PayPal.

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[1] A VPN is a virtual version of a secure, physical network that enables a computer or other WIFI enabled device to send and receive files or data across shared or public networks as if it were directly connected to a private network. VPN is used by individual Internet users for several reasons to include protecting personal identity and location.

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4. On or about February 23, 2016, the Swiss Federal Police forwarded the information they had obtained regarding HEITING to HSI's Cyber Crimes Center ("C3"), including over 100 known images and still images of videos of child pornography HEITING made available for others to download. The majority of the images depict prepubescent children engaged in sexually explicit conduct with adults or other children, including children engaged in vaginal sex, anal sex, oral sex, and bondage. Your Affiant has reviewed the images and still images from the videos and determined that the majority of them depict children engaged in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(a). The following are examples of the videos and images provided by CYCO:

a. Imgsrc Ru pthc Pedo Babyshivid Childlover Private Daughter Torpedo Ranchi Lolita – 12609281126_onionib.jpg – this image depicts a minor with the minor's hands bound behind the minor's back with duct tape and an adult male's penis penetrating the minor's anus.

b. Imgsrc Ru Pthc Pedo Babyshivid Childlover Private Daughter Torpedo Ranchi Lolita – 126756683936 Onionib.jpg – this image depicts a naked prepubescent female lying on her back with her legs spread exposing her genitalia. The prepubescent female's legs and hands are bound with black rope.

c. nudist Station Ptsc Pedo Incest Amateur Xxx Porn Teen Yr Preteen Hussyfan Kids Boy Boylover Lolita Child Kiddy 006.jpg – this image depicts a prepubescent female naked from the waist down and lying on her back. The prepubescent female's legs are spread exposing her genitalia. There is a male's penis penetrating the anus of the prepubescent female.

5. On March 7, 2016, I sent a DHS summons to Comcast for subscriber information for the IP address 69.136.237.81 on February 3, 2016 at 19:26:16 MEZ (UTC+1). According to Comcast, the subscriber of IP address 69.136.237.81 on February 3, 2016 at 19:26:16 MEZ (UTC+1) was Kevin HEITING, 3900 Chesterwood Drive, Silver Spring, Maryland 20906, telephone: 240-342-0120, account status: active, email: kheiting1@comcast.net. Additionally,

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Comcast indicated that IP address 69.136.237.81 had been assigned to HEITING from December 4, 2015 at 05:02:14 UTC through the date of the summons.

6. On or about March 8, 2016, a search of the Maryland Motor Vehicle Administration (MVA) records yielded a valid Maryland driver's license for Kevin Christopher HEITING, DOB: XX/XX/1988, with a corresponding address of 3900 Chesterwood Drive, Silver Spring, Maryland 20906, as HEITING's current address.

7. On March 11, 2016, I issued a DHS summons to AOL requesting subscriber information and most recent IP address history for the email address "foxhound11111111@netscape.net." According to AOL, the email address "foxhound11111111@netscape.net" was registered with the following information:

Name:	Ke He
State/Zip:	20904
Country Code:	US
Primary Email Address:	foxhound11111111@aim.com
Additional Email Address:	japanesebz3@netscape.net
Account Status:	**ACTIVE**
Member Since:	December 13, 2003

8. Additionally, AOL provided the most recent IP addresses that accessed the email account "foxhound11111111@netscape.com." The majority of the logins to this account from December 13, 2015 through March 10, 2016 were made from IP address 69.136.237.81. As stated above in paragraph 5, the subscriber of IP address 69.136.237.81 from December 4, 2015 from 05:02:14 UTC through at least March 7, 2016 (the date of the summons) was Kevin HEITING, 3900 Chesterwood Drive, Silver Spring, Maryland.

9. On March 7, 2016, I conducted a public records check using the phone number contained within the Comcast summons response dated March 7, 2016: 240-342-0120. Records indicate the subscriber of this number is Kevin HEITING, Silver Spring, Maryland 20906.

10. On March 14, 2016, I issued a summons to PayPal for account information relating to the email account foxhound11111111@netscape.net. On or about March 18, 2016, PayPal responded to the summons and their records revealed the following registration information:

First Name:	Kevin
Last Name:	heiting
DOB:	XX-XXX-88
CC Statement Name:	FOXHOUND111
Email:	foxhound11111111.netscape.net
Account Status:	Open
Account Created:	Sat. 30 Nov 2013 18:55:03
Account Type:	Personal
SSN:	xxx-xx-5482

11. PayPal records also revealed one active checking account and two active credit cards attached to the account all in the name of Kevin HEITING. PayPal also provided an IP address summary that revealed the last IP address used to log into the PayPal account was 69.136.237.81. This IP address was used five times to log into the PayPal account belonging to HEITING between December 13, 2015 at 15:00:03 GMT and March 13, 2016 at 12:31:17 GMT. As described above, the subscriber of IP address 69.136.237.81 from December 5, 2015 at 05:02:14 UTC through at least March 7, 2016 (the date of the summons) was Kevin HEITING, 3900 Chesterwood Drive, Silver Spring, Maryland.

12. On May 19, 2016, Special Agents from HSI Baltimore along with the Maryland State Police, and Montgomery County Police Department executed a federal search warrant at HEITING's residence in Silver Spring, Maryland. HEITING was the only one at the residence at the time of the warrant was executed. HEITING informed law enforcement that he was the only occupant of the residence.

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13. Subsequent to the execution of the search warrant, HEITING was interviewed by HSI Special Agents Christine Carlson and Gus Aquino. The interview was conducted in a vehicle because of lack of furniture and places to sit inside the residence. Prior to the interview beginning, HEITING was advised several times that he was not under arrest and free to leave. HEITING agreed to be interviewed by agents. HEITING stated he had always lived at the residence by himself and has been the only one in the residence for the past 2.5 years with the exception of the property manager that comes to inspect the inside of the residence. HEITING described himself as a "loner." HEITING has never been married and has no children. HEITING is a software developer for Elite Tech Group in Maryland. Elite Tech Group is a government contractor for the Department of Justice-Asset Forfeiture Section. HEITING is required to have a clearance for his job. HEITING admitted to having a PayPal account and stated "perhaps" he had purchased VPN service using his PayPal account. HEITING stated he would have purchased VPN service to stream TV. HEITING denied trading child pornography. HEITING admitted to using the email account foxhound11111111@netscape.com. HEITING stated that this email address is tied to his Amazon account and HEITING believed it is also tied to his PayPal account.

14. A forensic analysis of the 2TB Seagate external hard drive, s/n: 2GHNFYC2 that was attached to the black generic computer tower in HEITING's residence at the time the search warrant was executed revealed in excess of 23,000 files depicting children engaged in sexually explicit conduct. The files are in a folder labeled "incoming" and in subfolders labeled "b+b", "b+m", "ba", "g+b", "g+g", "g+w", "g+m", "pic", "unchecked", "unseen1", "unseen2", "unseen3", "unseen4", "unseen5", and "unseen7". I have reviewed a sampling of the files in each of the first 8 folders and determined, based on the content, that the folder labels are

consistent with the content (ie, boy and boy, boy and man, baby, girl and boy, girl and girl, girl and woman, girl and man, and pic). The sexually explicit conduct depicted in the files I have reviewed includes, oral sex, anal sex, vaginal sex, bondage, and masturbation. By way of example, three of the files I reviewed are described as follows:

a. **cp 570.bmp** – this image is located in the "pic" folder and in the subfolder "ba" on the Seagate external hard drive and depicts a naked prepubescent female lying on a bed wearing a black studded collar. The prepubescent female's hands are covering her eyes. There is a naked adult male between her spread legs with his erect penis penetrating the prepubescent female's vagina.

b. **cp 13.bmp** – this image is located in the "pic" folder and in the subfolder "g" on the Seagate external hard drive and depicts a naked prepubescent female that is bound and gagged. The prepubescent female's legs are spread and there is an object inserted into her vagina.

c. **1yo buttfuck.avi** – this video is located in the "ba" folder on the Seagate external hard drive and is approximately 2 minutes and 18 second long. The video depicts an erect penis penetrating the anus of a prepubescent female. At the end of the video, the male ejaculates on the leg and vagina of the prepubescent female.

The above referenced files are child pornography as defined in Title 18, United States Code, Section 2256(a).

15. On August 9, 2016, HEITING was traveling back to the United States from Belize aboard Delta flight 695 when he was referred to secondary baggage inspection by Customs and Border Protection (CBP). While in secondary, HEITING was asked to place all of his belongings on the inspection table. HEITING was very nervous and quickly stated, "I have a computer laptop and it is very sensitive." According to CBP personnel, HEITING's hands were trembling and his voice was cracking. HEITING insisted on being present during the inspection of his bags because he was traveling with approximately $8000 USD. HEITING stated he was returning from a five-day trip to Belize. HEITING stated the reason he wanted to open a bank

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account in Belize is because it would aide him in purchasing property in Belize. HEITING stated he planned on moving to Belize in the near future.

CONCLUSION

16. Based upon all of the information set forth in this application, I respectfully submit that there is probably cause to believe that Kevin HEITING violated Title 18, United States Code, Section 2252A(a)(5)(B) (Possession of Child Pornography).

Christine D. Carlson
Special Agent
Homeland Security Investigations

Sworn and subscribed before me this 18th day of August, 2016.

Timothy J. Sullivan
United States Magistrate Judge